

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

RAISHAWN KEY

Plaintiff

v.

CITY OF AUGUSTA,
ROBERTA FOGG,
WILLIAM BRIDGEON,
SUE GOSSELIN, &
JOHN DOES ## 1-4,

Defendants.

Case No. 1:17-cv-00007-JDL

PLAINTIFF'S FIRST CONSOLIDATED DISCOVERY REQUESTS

Pursuant to Rules 33-34, 36, Fed.R.Civ.P., Plaintiff Raishawn Key, requests that the City of Augusta, Roberta Fogg, William Bridgeon, Sue Gosselin, and John Does ## 1-4 (collectively, the Defendants) respond and produce as appropriate the below requests, providing such request to the plaintiff at 807 Cushing Road, Warren, ME. 04864, within thirty (30) days of the date hereof.

DEFINITIONS AND INSTRUCTIONS

For the sake of simplicity and to prevent unnecessary duplicity, the plaintiff accepts the definitions and instructions provided by the Defendants as outlined in the *Defendant's First Consolidated Discovery* Request dated on April 10, 2017.

REQUESTS FOR PRODUCTION

1. All documents showing or reflecting communications between the plaintiff and the City of Augusta and its employee's agents. Contractors, vendors, and/or other third parties.
2. All documents reflecting, containing, or showing non-privileged communications amongst the City of Augusta, its employees', agents, contractors, vendors, and/or other third parties relating to the plaintiff, whether directly or tangentially, and/or relating to the allegations in the Complaint.
3. Any and all documents containing policies, procedures, regulations, directives, memorandums, departmental protocols, instructions, etc. created and/or utilized by the City of Augusta in executing the manner, methods, and conditions by which Voter Registration and Absentee Ballot requests are received, processed, and disposed of.
4. Any and all documents containing policies, procedures, regulations, directives, memorandums, departmental protocols, instructions, etc. detailing the individual and collective responsibilities of each City of Augusta employee involved in the handling and disposition of Voter Registration and Absentee Ballot requests.

5. Any and all documents containing policies, procedures, regulations, directives, memorandums, departmental protocols, instructions, software, data management systems, etc. that provide insight into how voter address requirements are verified, authenticated, and/or stipulated.
6. Any and all documents containing policies, procedures, regulations, directives, memorandums, departmental protocols, instructions, etc. pertaining to the City's formal complaint / administrative remedy process through which citizen grievances may be addressed and the methods through which the City of Augusta makes citizens aware of such process and where such information can be obtained.
7. Any and all documents, records, database systems, etc. that reflect the number of Voter Registration and Absentee Ballot requests that have been denied during the past eight years detailing descriptions for the reason of such denial.
8. All documents used by the City of Augusta that proves that the plaintiff's address as listed on his Voter Registration and Absentee Ballot applications is invalid.
9. All documents identified or discussed in any of your responses to any of these discovery requests.

INTERROGATORIES

1. State in detail the procedure utilized by the City of Augusta in processing absentee ballots
2. State in detail the procedures utilized in verifying voter eligibility requirements, including addresses. Please include any auditing measures the City of Augusta might use to ensure compliance with these procedures.
3. State in detail the policies followed when accepting *Voter Registration* and *Absentee Ballot* applications from a third party.
4. Please describe the official job duties and responsibilities of all defendants with the exclusion of John Doe ## 1-4.
5. Name and describe the responsibilities of any other City of Augusta employee involved in the receiving, processing, handling, and disposition of Absentee Ballots.
6. Please state the names, titles, and duties of any other person who was involved in the receiving, handling, processing, and disposition of the plaintiff's Voter Registration application and application for Absentee Ballot.
7. Please describe how the plaintiff's criminal history is relevant or has any bearing with his right to vote, as guaranteed by state law.
8. Please state in detail how each of the defendants (excluding John Doe ## 1-4) feels about a convicted felon exercising his statutorily protected right to vote.

Note: If any of this information is set forth in any document, please produce that document.

REQUESTS FOR ADMISSION

Defendants are requested to admit or deny the following facts:

1. Plaintiff's criminal history is irrelevant to this case.
2. Plaintiff's State I.D. shows his address as 3 Noyce Ct. Apt. #1, Augusta, ME.
3. Defendants' received plaintiff's Voter Registration and Absentee Ballot application on or about October 1, 2016 from the Office of the Maine Secretary of State.

Date: May 8, 2017

Signature: Raishawn Key
Raishawn Key, Plaintiff